

No. 21-1397

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IN THE  
**Supreme Court of the United States**

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IN RE GRAND JURY

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**On Writ of Certiorari to the  
United States Court of Appeals  
for the Ninth Circuit**

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**BRIEF OF *AMICUS CURIAE* AMERICAN BAR  
ASSOCIATION IN SUPPORT OF PETITIONER**

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 7,303 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

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Executed on November 23, 2022.

  
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Alan James Smith  
Wilson-Epes Printing Co., Inc.